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**VIA ECF**

June 18, 2024

**Honorable Jamel K. Semper, U.S.D.J**  
Martin Luther King Building & U.S. Courthouse  
50 Walnut St.  
Newark, New Jersey 07102  
**CC: Counsel of Record (via Email & ECF)**

**Re: Sabbagh v. Insurance Auto Auctions, Golden State Automarket, et al., 2-24-cv-06742**  
Request for Adjournment of Defendants' Motions to Dismiss to Permit Motion to Remand

Dear Judge Semper:

I am writing to you as the *pro-se* Plaintiff in the above-referenced case. I am respectfully requesting an adjournment of Defendants' Motions to Dismiss, filed on June 6, 2024 and June 13, 2024. Both motions are currently returnable July 15, 2024.

Pursuant to 28 U.S. Code § 1447(c), Plaintiff is afforded 30 days, following the June 6, 2024 removal, to move before this Court to remand the case. There are serious issues with Defendants' removal, it is built on several fault bases, including procedural missteps, and I intend to show good cause for such necessary relief. Critically, there are details that will be part of my motion that must be settled prior to hearing of either adversary motions.

Further, I am currently overseas visiting my ill mother, and I expect to return to the United States the third week of July.

I kindly ask that the Court advise to a new date for Defendants' motions to dismiss. I have obtained the consent of Mr. Mark S. Hanna, and Mr. Jonathan R. Miller, adversary counsel, for this adjournment.

Thank you for your consideration of this request.

Respectfully submitted,  
**BASHAR SABBAGH**  
*Pro-Se Plaintiff*